



National Highway Traffic Safety Administration

[Docket Number NHTSA-2020-0101]

Agency Information Collection Activities; Notice and Request for Comment; Reporting of Information and Documents about Potential Defects

AGENCY: National Highway Traffic Safety Administration (NHTSA), Department of Transportation (DOT).

ACTION: Notice and request for public comments on a reinstatement with modification of a previously approved collection of information.

SUMMARY: In compliance with the Paperwork Reduction Act of 1995 (PRA), this notice announces that the Information Collection Request (ICR) summarized below will be submitted to the Office of Management and Budget (OMB) for review and approval. The ICR describes the nature of the information collection and its expected burden. The National Highway Traffic Safety Administration (NHTSA) invites public comments about our intention to request Office of Management and Budget (OMB) approval for an extension of a currently approved information collection for reporting of information and documents about potential defects. A *Federal Register* Notice with a 60-day comment period soliciting comments on the following information collection was published on December 29, 2020. No comments were received.

DATES: Comments must be received on or before **[INSERT DATE 30 DAYS AFTER PUBLICATION IN THE FEDERAL REGISTER]**.

ADDRESSES: Written comments and recommendations for the proposed information collection, including suggestions for reducing burden, should be submitted to the Office of Management and Budget at www.reginfo.gov/public/do/PRAMain. To find this particular information collection, select “Currently under Review – Open for Public Comment” or use the search function.

FOR FURTHER INFORMATION CONTACT: For additional information or access to

background documents, contact, Jeff Quandt, Trends Analysis Division (NEF-108), Room W48-312, National Highway Traffic Safety Administration, 1200 New Jersey Ave., Washington, DC 20590. Telephone: (202) 366-5207. Please identify the relevant collection of information by referring to its OMB Control Number.

SUPPLEMENTARY INFORMATION: Under the PRA (44 U.S.C. 3501 et seq.), a Federal agency must receive approval from the Office of Management and Budget (OMB) before it collects certain information from the public, and a person is not required to respond to a collection of information by a Federal agency unless the collection displays a valid OMB control number. In compliance with these requirements, this notice announces that the following information collection request will be submitted OMB.

A *Federal Register* notice with a 60-day comment period soliciting public comments on the following information collection was published on December 29, 2020 (85 FR 85848). No comments were received.

Title: Reporting of Information and Documents about Potential Defects

OMB Control Number: 2127-0616.

Form Number: 2020-28766.

Type of Request: Reinstatement with modification of a previously approved information collection.

Type of Review Requested: Regular.

Length of Approval Requested: 3 years from date of approval.

Summary of the Collection of Information: This notice requests comment on NHTSA's intention to seek approval from OMB to reinstate with modification a previously approved collection of information, OMB No. 2127-0616, covering requirements in 49 CFR 579,

Reporting of Information and Communications about Potential Defects. Part 579 implements, and addresses with more specificity, requirements from the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act (Public Law No. 106-414), which was

enacted on November 1, 2000, and are codified at 49 U.S.C. 30166.

The purpose of Part 579 is to enhance motor vehicle safety by specifying information and documents that manufacturers of motor vehicles and motor vehicle equipment must provide to NHTSA with respect to possible safety-related defects and non-compliances in their products, including the reporting of safety recalls and other safety campaigns the manufacturers conduct outside the United States. Under Part 579, there are three categories of reporting requirements: (1) requirements at § 579.5 to submit notices, bulletins, customer satisfaction campaigns, consumer advisories, and other communications (found in Subpart A of Part 579); (2) requirements at § 579.11 to submit information related to safety recalls and other safety campaigns in foreign countries (found in Subpart B of Part 579); and (3) requirements at §§ 579.21-28 to submit Early Warning Information (found in Subpart C of Part 579). The Early Warning Reporting (EWR) requirements (49 U.S.C. 30166(m); 49 CFR Part 579, Subpart C) specify that manufacturers of motor vehicles and motor vehicle equipment must submit to NHTSA information, periodically or upon NHTSA's request, that includes specified claims for deaths and serious injuries, property damage data, communications from customers and others, and other information that assists NHTSA in identifying potential safety-related defects. The intent of this information collection is to provide early warning of such potential safety-related defects to NHTSA.

Description of the Need for the Information and Proposed Use of the Information:

The information required under 49 U.S.C. 30166 and 49 CFR Part 579 is used by NHTSA to promptly identify potential safety-related defects in motor vehicles and motor vehicle equipment in the United States. When a trend in incidents arising from a potentially safety-related defect is discovered, NHTSA relies on this information, along with other agency data, to determine whether to open a defect investigation.

Affected Public: Manufacturers of motor vehicles and motor vehicle equipment.

Estimated Number of Respondents: NHTSA receives Part 579 submissions from approximately

337 manufacturers per year. Therefore, we estimate that there will be a total of 337 respondents to this information collection per year.

Estimated Total Annual Burden Hours: When this approved information collection was last renewed in June 2017, NHTSA estimated the annual burden associated with this collection to be 49,243 burden hours. NHTSA is updating these estimates to better align with the current volume of submissions and to include reporting requirements for common green tires and follow-up sequences (per § 579.28(l)), which were inadvertently omitted from the previous information collection request. NHTSA now estimates that the annual burden hours associated with this collection are 53,810 hours.

NHTSA estimated the burdens associated with this collection by calculating the burden associated with submitting information under each subpart of Part 579. In addition to these burdens, NHTSA also estimates that manufacturers will incur computer maintenance burden hours, which are estimated on a per manufacturer basis.

Requirements under Part 579, Subpart A

The first component of this collection request covers the requirements found in Part 579 Subpart A, § 579.5, Notices, bulletins, customer satisfaction campaigns, consumer advisories, and other communications. Section 579.5 requires manufactures to furnish (1) a copy of all notices, bulletins, and other communications sent to more than one manufacturer, distributor, dealer, lessor, lessee, owner, or purchaser, in the United States, regarding any defect in its vehicles or items of equipment (including any failure or malfunction beyond normal deterioration in use, or any failure of performance, or any flaw or unintended deviation from design specifications), whether or not such defect is safety-related and (2) a copy of each communication relating to a customer satisfaction campaign, consumer advisory, recall, or other safety activity involving the repair or replacement of motor vehicles or equipment, that the manufacturer issued to, or made available to, more than one dealer, distributor, lessor, lessee, other manufacturer, owner, or purchaser, in the United States. Manufacturers are required to

submit these documents monthly. Section 579.5 does not require manufacturers to create these documents. Instead, only copies of these documents must be submitted to NHTSA, and manufacturers must index these communications and email them to NHTSA within 5 working days after the end of the month in which they were issued. Therefore, the burden hours are only those associated with collecting the documents and submitting copies to NHTSA.

NHTSA estimates that it receives approximately 24,884 notices a year. We estimate that it takes about 5 minutes to collect, index, and send each notice to NHTSA. Therefore, we estimate that it takes 2,074 hours for manufacturers to submit notices as required under Section 579.5 (24,884 notices \times 5 minutes = 124,420 minutes or 2,074 hours).

To calculate the labor cost associated with submitting Section 579.5 notices, bulletins, customer satisfaction campaigns, consumer advisories and other communications that are sent to more than one dealer or owner, NHTSA looked at wage estimates for the type of personnel submitting the documents. While some manufacturers employ clerical staff to collect and submit the documents, others use technical computer support staff to complete the task. Because we do not know what percent of the work is completed by clerical or technical computer support staff, NHTSA estimates the total labor costs associated with these burden hours by looking at the average wage for the higher paid technical computer support staff. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Computer Support Specialists (BLS Occupation code 15-1230) in the Motor Vehicle Manufacturing Industry is \$31.39.¹ The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.2% of total labor compensation costs.² Therefore, NHTSA estimates the hourly labor costs to be \$44.72 for Computer Support Specialists. The labor cost per submission is estimated to be \$3.73 (\$44.72 \times 5 minutes). NHTSA estimates the total labor cost associated with the 2,074 burden hours for §

¹ May 2019 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, https://www.bls.gov/oes/current/naics4_336100.htm#15-0000. Last Accessed June 17, 2020.

² Employer Costs for Employee Compensation, U.S. Bureau of Labor Statistics, <https://www.bls.gov/news.release/ecec.t01.htm>. Last Accessed July 30, 2020.

579.5 submissions to be \$92,817.32 (\$3.73 x 24,884 submissions). Table 1 provides a summary of the burden estimates using the average annual submission count for monthly reports submitted pursuant to § 579.5 and the estimated burden hours and labor costs associated with those submissions.

Table 1: Burden Estimates for § 579.5 Submissions

Average Annual § 579.5 Submissions	Estimated Burden Per Submission	Average Hourly Labor Cost	Labor Cost Per Submission	Total Burden Hours	Total Labor Costs
24,884	5 minutes	\$44.72	\$3.73	2,074	\$92,817.32 or \$92,817

Requirements under Part 579, Subpart B (Foreign Reporting)

The second component of this information collection request covers the requirements found in Part 579 Subpart B, “Reporting of Safety Recalls and Other Safety Campaigns in Foreign Countries.” Pursuant to § 579.11, whenever a manufacturer determines to conduct a safety recall or other safety campaign in a foreign country, or whenever a foreign government has determined that a safety recall or other safety campaign must be conducted, covering a motor vehicle, item of motor vehicle equipment, or tire that is identical or substantially similar to a vehicle, item of equipment, or tire sold or offered for sale in the United States, the manufacturer must report to NHTSA not later than 5 working days after the manufacturer makes such determination or receives written notification of the foreign government’s determination. Section 579.11(e) also requires each manufacturer of motor vehicles to submit, not later than November 1 of each year, a document that identifies foreign products and their domestic counterparts.

In order to provide the information required for foreign safety campaigns, manufacturers must (1) determine whether vehicles or equipment that are covered by a foreign safety recall or other safety campaign are identical or substantially similar to vehicles or equipment sold in the United States, (2) prepare and submit reports of these campaigns to the agency, and (3) where a

determination or notice has been made in a language other than English, translate the determination or notice into English before transmitting it to the agency.

NHTSA estimates that there is no burden associated with determining whether an individual safety recall covers a foreign motor vehicle or item of motor vehicle equipment that is identical or substantially similar to those sold in the United States because manufacturers can simply consult the list that they are required to submit each year. Therefore, the only burden associated with making the determination of whether a foreign safety recall or other safety campaign is required to be reported to NHTSA is the burden associated with creating the annual list. NHTSA continues to estimate that it takes approximately 9 hours per manufacturer to develop and submit the list. The 9 hours are comprised of 8 attorney hours and 1 hour for IT work. NHTSA receives these lists from 101 manufacturers, on average, resulting in 909 burden hours ($101 \text{ vehicle manufacturers} \times 8 \text{ hours for attorney support} = 808 \text{ hours}$) + ($101 \text{ vehicle manufacturers} \times 1 \text{ hour for IT support} = 101 \text{ hours}$).

NHTSA estimates that preparing and submitting each foreign defect report (foreign recall campaign) requires 1 hour of clerical staff and that translation of determinations into English requires 2 hours of technical staff (note: this assumes that all foreign campaign reports require translation, which is unlikely). Between 2016 and 2018, NHTSA received a yearly average of 227 foreign recall reports. NHTSA estimates that in each of the next three years, NHTSA will receive, on average, 227 foreign recall reports. NHTSA estimates that each report will take 3 hours (1 hour to prepare by a clerical employee and 2 hours for translation). Therefore, NHTSA estimates that the burden hours associated with submitting these reports will be 681 hours ($3 \text{ hours per report} \times 227 \text{ reports}$).

Therefore, NHTSA estimates the total annual burden hours for reporting foreign safety campaigns and substantially similar vehicles/equipment is 1,590 hours (909 hours for submitting annual lists + 681 hours for submitting foreign recall and safety campaign reports). This is an increase of 444 burden hours from our previous estimate (1,590 hours for current estimate –

1,146 hours for previous estimate). Table 2 provides a summary of the estimated burden hours for Part 579 Subpart B submissions.

Table 2: Burden Hour Estimates for Foreign Reporting

Submission Type	Annual Number of Submissions	Burden Hours Per Report	Total Burden Hours
Foreign Recall/Safety-Related Campaign Report	227	1 hour clerical + 2 hours translation = 3 hours	681 hours
Annual List	101	8 hours attorney + 1 hour IT = 9 hours	909 hours
Total			1,590 hours

To calculate the labor cost associated with Part 579 foreign reporting submissions, NHTSA looked at wage estimates for the type of personnel submitting the documents. As stated above, NHTSA estimates that submitting annual lists under § 579.11(e) will involve 8 hours of attorney time and 1 hour of IT work. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Lawyers (BLS Occupation code 23-1000) in the Motor Vehicle Manufacturing Industry is \$95.85³ and the average hourly wage for Computer Support Specialists (BLS Occupation code 15-1230) in the Motor Vehicle Manufacturing Industry is \$31.39.⁴ The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.2% of total labor compensation costs.⁵ Therefore, NHTSA estimates the hourly labor costs to be \$136.54 for Lawyers and \$44.72 for Computer Support Specialists. NHTSA estimates the total labor cost associated with submitting one annual list to be \$1,137.04 (\$136.54 per hour × 8 attorney hours + \$44.72 per hour × 1 IT hour) and \$114,841.04 or \$114,841 for all 101 annual lists NHTSA estimates will be submitted annually.

NHTSA estimates that submitting each foreign recall or safety campaign report involves

³ May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 336100 - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, https://www.bls.gov/oes/current/naics4_336100.htm#23-0000. Last accessed July 31, 2020.

⁴ https://www.bls.gov/oes/current/naics4_336100.htm#15-0000. Last accessed July 31, 2020.

⁵ Employer Costs for Employee Compensation, U.S. Bureau of Labor Statistics, <https://www.bls.gov/news.release/ecec.t01.htm>. Last accessed July 31, 2020.

1 hour of clerical work and 2 hours of translation work. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Office Clerks (BLS Occupation code 43-9061) in the Motor Vehicle Manufacturing Industry is \$20.74⁶ and the average hourly wage for Interpreters and Translators (BLS Occupation code 27-3091) is \$27.40⁷. The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.2% of total labor compensation costs.⁸ Therefore, NHTSA estimates the hourly labor costs to be \$29.54 for Office Clerks and \$39.03 for Interpreters and Translators. NHTSA estimates the total labor cost associated with submitting one foreign recall or safety campaign report to be \$107.60 (\$29.54 per hour × 1 Clerical hour + \$39.03 per hour × 2 Translator hours) and \$24,425.20 or \$24,425 for all 227 foreign recall or safety campaign reports NHTSA estimates will be submitted annually.

Table 3 provides a summary of the labor costs associated with the foreign reporting requirements in Part 579, Subpart B. NHTSA estimates that the total labor costs associated with the annual list requirement and the requirement to report foreign recalls and safety campaigns is \$139,266 (\$114,841 + \$24,425).

Table 3: Annual Labor Cost Estimates for Foreign Reporting

Submission Type and Labor Category	Hours Per Submission	Hourly Labor Cost	Labor Cost Per Submission	Number of Submissions	Total Labor Cost
Annual List-Lawyer	8	\$136.54	\$1,092.32	101	\$110,324.32
Annual List-Computer Specialist	1	\$44.72	\$44.72	101	\$4,516.72
Totals for Annual List	9		\$1,137.04		\$114,841.04 or \$114,841
Foreign Recall/Safety-Related Campaign Report-Clerical	1	\$29.54	\$29.54	227	\$6,705.58
Foreign	2	\$39.03	\$78.06	227	\$17,719.62

⁶ May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 336100 - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, https://www.bls.gov/oes/current/naics4_336100.htm#43-0000. Last Accessed June 17, 2020.

⁷ May 2019 National Occupational Employment and Wage Estimates United States, U.S. Bureau of Labor Statistics, https://www.bls.gov/oes/current/oes_nat.htm. Last Accessed June 17, 2020.

⁸ Employer Costs for Employee Compensation, U.S. Bureau of Labor Statistics, <https://www.bls.gov/news.release/ecec.t01.htm>. Last Accessed July 31, 2020.

Recall/Safety-Related Campaign Report-Translator					
Totals for Foreign Recall/Safety Campaign Report	3		\$107.60		\$24,425.20 or \$24,425
Total Labor Costs for Part 579 Subpart B Requirements					\$139,266.24 or \$139,266

Requirements under Part 579, Subpart C (Reporting of Early Warning Information (EWR))

The third component of this information collection covers the requirements found in Part 579 Subpart C, “Reporting of Early Warning Information.” Besides production information, there are five major categories requiring reporting of incidents or claims in Subpart C, with the specific requirements and applicability of those categories varying by vehicle and equipment type and, in some circumstances, manufacturer volume. Sections 579.21-27 require manufacturers to submit the following: (1) production information; (2) reports on incidents involving death or injury in the United States that are identified in claims or notices alleging that the death or injury was caused by a possible defect; (3) reports on incidents identified in a claim against a manufacturer that involve one or more deaths in a foreign country and involve a vehicle or item of equipment that is identical or substantially similar to a vehicle or item of equipment that is offered for sale in the United States; (4) separate reports on the number of property damage claims, consumer complaints, warranty claims, and field reports that involve a specified system or event; (5) copies of field reports; and, for manufacturers of tires, (6) a list of common green tires (applicable to only tire manufacturers). Section 579.28(1) allows NHTSA to request additional related information to help identify a defect related to motor vehicle safety. The regulation specifies the time frame for reporting for each category. Foreign recalls of substantially similar vehicles and manufacturer communications are required to be submitted monthly, substantially similar vehicle listings are required annually, and all other report types are required to be submitted on a quarterly basis.

Quarterly Reporting

Manufacturers are required to report specific information to NHTSA on a quarterly basis (e.g., 4 times per calendar year). Manufacturers are required to submit production information,⁹ non-dealer field reports, aggregate submissions, and death and injury submissions on a quarterly basis. Estimates of the burden hours and reporting costs are based on:

- The number of manufacturers reporting;
- The frequency of required reports;
- The number of hours required per report; and
- The cost of personnel to report.

The number of hours for reporting ranges from 1 hour for trailer manufacturers to 8 hours for light vehicle manufacturers (Table 4). Quarterly reporting burden hours are calculated by multiplying hours used to report for a given category by the number of manufacturers for the category and by the four times per year quarterly reporting. Using these methods and the average number of manufacturers who report annually, we estimate the annual burden hours for quarterly reporting of production information at 5,216 hours as detailed below in Table 4.

NHTSA assumes that 50 percent of the total burden hours are utilized by technical personnel while clerical staff consumes the remaining 50 percent. In other words, the hourly wage rate for each quarterly report is split evenly between technical and clerical personnel and a weighted hourly rate is developed from this assumption. Therefore, using the BLS total hourly compensation rates discussed above of \$44.72 for a Computer Support Specialist and \$29.54 for an Office Clerk, the weighted hourly rate is \$37.13 (Technical Mean Hourly Wage of \$44.72 x 0.5 + Clerical Mean Hourly Wage of \$29.54 x 0.5). The estimated reporting costs are calculated as follows:

$$(M \times T_p \times \$37.13 = \text{quarterly cost of reporting}) \times 4 = \text{annual cost of reporting}^*$$

⁹ Low volume and equipment manufacturers are not required to submit production information.

*M = Manufacturers reporting data in the category; T_p = Reporting time for the category; \$37.13 = Reporting labor cost compensation rate; 4 =

Quarterly reports per year

For example, the estimated reporting cost for light vehicles is \$42,773.76 (36 manufacturers x 8 hours x \$37.13 compensation rate x 4 quarters), and the total annual labor costs associated with quarterly reporting are estimated to be \$193,670. Table 4 includes the estimated burden hours and reporting costs for production information, non-dealer field reports, aggregate submissions, and death and injury submissions, as well as the quarterly and annual labor costs associated with reporting.

**Table 4: Estimated Manufacturer Annual Burden Hours and Labor Costs
for Quarterly Reporting**

Vehicle/Equipment Category	Avg. Number of Manufacturers	Quarterly Hours to Report per Manufacturer	Blended Hourly Comp. Rate	Quarterly Labor Costs per Manufacturer	Annual Burden Hours for Reporting	Annual Labor Costs
Light Vehicles	36	8	\$37.13	\$297.04	1,152	\$42,773.76
Medium-Heavy Vehicles	39	5	\$37.13	\$185.65	780	\$28,961.40
Trailers	96	1	\$37.13	\$37.13	384	\$14,257.92
Motorcycles	15	2	\$37.13	\$74.26	120	\$4,455.60
Emergency Vehicles	8	5	\$37.13	\$185.65	160	\$5,940.80
Buses	33	5	\$37.13	\$185.65	660	\$24,505.80
Tires	32	5	\$37.13	\$185.65	640	\$23,763.20
Child Restraints	42	1	\$37.13	\$37.13	168	\$6,237.84
Vehicle Equipment	36	8	\$37.13	\$297.04	1,152	\$42,773.76
Totals		40			5,216 Hours	\$193,670.08 or \$193,670

Early Warning Reporting (EWR) Field Data Submissions¹⁰

Table 5 provides an average annual submission count for each category submitted per the requirements of 49 CFR Part 579, Subpart C: reports on incidents identified in claims or notices involving death or injury in the United States; reports on incidents involving one or more deaths in a foreign country identified in claims involving a vehicle or item of equipment that is identical

¹⁰ Field data includes incidents identified in claims or notices involving deaths or injuries and consumer complaint, field report, property damage claim and warranty claim data.

or substantially similar to a vehicle or item of equipment that is offered for sale in the United States; separate reports on the number of property damage claims, consumer complaints, warranty claims, and field reports that involve a specified system or event; copies of field reports; and, for manufacturers of tires; a list of common green tires; and additional follow-up information per 579.28(l) related to injury and fatality claims or comprehensive inquiries. Each reporting category has specific requirements and types of reports that need to be submitted and we state “N/A” where there is no requirement for that reporting category.

Table 5: Annual Average of EWR Submissions by Manufacturers (2016 – 2018)

Category of Claims	<i>Light Vehicles</i>	<i>Heavy, Med Vehicles</i>	<i>Trailers</i>	<i>Motorcycles</i>	<i>Emergency Vehicles</i>	<i>Buses</i>	<i>Tires</i>	<i>Child Restraints</i>	<i>Equipment Mfr.</i>	Totals
Incidents Involving Injury or Fatality in U.S.	11,124	39	30	133	8	33	58	453	9	11,887
Incidents Involving Fatality in Foreign Country	146	6	5	2	0	1	3	167	0	330
Reports on Number of Claims Involving Specific System or Event	10,261	666	91	40	0	0	1,154	NA	NA	12,212
Mfr. Field Reports	66,722	16,639	20	1,301	0	0	NA	3,727	NA	88,409
Common Green Tire Reporting	NA	NA	NA	NA	NA	NA	112	NA	NA	112
Average Number of Follow-Up Sequences per 579.28(l)	148	10	3	5	1	1	3	17	2	190
Totals:	88,401	17,360	149	1,481	9	35	1,330	4,364	11	113,140

The above updated submission totals represent an 12% increase from the previously approved information collection. Submission totals for each category have risen with an average of 11,887 injury and fatality claims in the United States (previously 9,804 claims), 330 foreign death claims (previously 101 claims), 12,212 claims involving specific system or event

(previously 11,481 claims), 88,409 manufacturer field reports (previously 79,297 field reports), 112 common green tire reports, and 190 injury and fatality or comprehensive inquiry follow-up sequences per 579.28(l), totaling 113,140 submissions on average (previously estimated at 100,683 submissions).

The agency estimates that an average of 5 minutes is required for a manufacturer to process each report, except for foreign death claims and follow-up responses. We estimate foreign death claims and follow-up responses per § 579.28(l) require an average of 15 minutes to process. Multiplying the total average number of minutes by the number of submissions NHTSA receives in each reporting category yields the burden hour estimates found below in Table 6. Our previous estimates of Early Warning associated burden hours totaled 8,407, and we now update that total to 9,515 burden hours, a 13.2% increase, associated with the above noted claim categories.

Table 6: Annual Manufacturer Burden Hour Estimates for EWR Submissions

Category of Claims	Annual Average of EWR Submissions	Average Time to Process Each Report	Estimated Annual Burden Hours
Incidents Involving Injury or Fatality in U.S.	11,887	5 min.	990.58 hrs.
Incidents Involving Fatality in Foreign Country	330	15 min.	82.50 hrs.
Reports on Number of Claims Involving Specific System or Event	12,212	5 min.	1,017.67 hrs.
Mfr. Field Reports	88,409	5 min.	7,367.42 hrs.
Common Green Tire Reporting	112	5 min.	9.33 hrs.
Average Number of	190	15 min.	47.5 hrs.

Follow-Up Sequences per 579.28(1)			
Totals:	113,140 Submissions		9,515 hours

Thus, the total estimated annual manufacturer burden hours for Sections 579.21-28 (EWR submissions and quarterly reporting) are 14,731 hours (5,216 (Table 4) + 9,515 (Table 6).

We have also constructed various estimates of the average five minutes of labor among the various occupations depending on the type of claim that was reviewed. Table 7 shows the estimated time allocations that it will take an individual to review each type of claim (in minutes) and the weighted hourly rate for individuals involved.

Table 7: Estimated Manufacturer Time Allocation by Claim Type and Weighted Hourly Rate

Claim Type	Estimated Time (in minutes) to Review A Claim						Weighted Hourly Rate
	Lawyer (Rate: \$136.54 ¹¹)	Engineer (Rate: \$63.03 ¹²)	IT (Rate: \$66.82 ¹³)	Technical (Rate: \$44.72 ¹⁴)	Clerical (Rate: \$29.54 ¹⁵)	Total Time	
Incidents Involving Injury or Fatality in U.S.	3	0	0	0	2	5	\$93.74
Incidents Involving Fatality in Foreign Country	3	10	0	0	2	15	\$73.27
Reports on Number of Claims Involving Specific System or Event	0	0	0	3	2	5	\$38.65
Mfr. Field Reports	0	0	0	3	2	5	\$38.65
Green Tire Events	0	0	0	0	5	5	\$29.54

¹¹ May 2019 National Industry-Specific Wage Estimates, - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, Lawyers (Code 23-1000), \$95.85, https://www.bls.gov/oes/current/naics4_336100.htm#23-0000, divided by 70.2% for compensation rate, <https://www.bls.gov/news.release/ecec.t01.htm>.

¹² May 2019 National Industry-Specific Wage Estimates - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, Engineers (Code 17-2000), \$44.25, https://www.bls.gov/oes/current/naics4_336100.htm#17-0000, divided by 70.2% for compensation rate, <https://www.bls.gov/news.release/ecec.t01.htm>.

¹³ May 2019 National Occupational Employment and Wage Estimates, U.S. Bureau of Labor Statistics, Computer and Information Analysts (Code 15-1210), \$46.91, https://www.bls.gov/oes/current/oes_nat.htm#15-0000, divided by 70.2% for compensation rate, <https://www.bls.gov/news.release/ecec.t01.htm>.

¹⁴ May 2019 National Industry-Specific Wage Estimates - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, Computer Support Analyst (Code 15-1230), \$31.39, https://www.bls.gov/oes/current/naics4_336100.htm#15-0000, divided by 70.2% for compensation rate, <https://www.bls.gov/news.release/ecec.t01.htm>.

¹⁵ May 2019 National Industry-Specific Wage Estimates - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, Office Clerks (Code 43-9061), \$20.74, https://www.bls.gov/oes/current/naics4_336100.htm#43-0000, divided by 70.2% for compensation rate, <https://www.bls.gov/news.release/ecec.t01.htm>.

Average Number of Follow-Up Sequences per 579.28(l)	3	10	0	0	2	15	\$73.27
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The total labor costs for claims documents were obtained using the following formula:

$$K \times T \times W = \text{Costs for claim type}^*$$

*K = Claims submitted by industry; T = Estimated time spent on a claim; W = Weighted Hourly Rate.

Table 8 shows the annual labor costs of reporting EWR information to NHTSA.

Table 8: Estimated EWR Annual Labor Costs by Category

Category of Claims	Annual Average of EWR Submissions	Average Time to Process Each Report	Weighted Hourly Rate	Estimated Labor Cost per Submission	Estimated Annual Labor Cost
Incidents Involving Injury or Fatality in U.S.	11,887	5 min.	\$93.74	\$7.81	\$92,857.28
Incidents Involving Fatality in Foreign Country	330	15 min.	\$73.27	\$18.32	\$6,044.78
Reports on Number of Claims Involving Specific System or Event	12,212	5 min.	\$38.65	\$3.22	\$39,332.82
Mfr. Field Reports	88,409	5 min.	\$38.65	\$3.22	\$284,750.65
Common Green Tire Reporting	112	5 min.	\$29.54	\$2.46	\$275.71
Average Number of Follow-Up Sequences per 579.28(l)	190	15 min.	\$73.27	\$18.32	\$3,480.33
Totals:	113,140 Submissions				\$426,741.56 or \$426,742

Computer Maintenance Burden

In addition to the burden associated with submitting documents under each subpart of Part 579, NHTSA also estimates that manufacturers will incur computer maintenance burden hours associated with the information collection requirements. The estimated manufacturer burden hours associated with aggregate data submissions for consumer complaints, warranty claims, and dealer field reports are included in reporting and computer maintenance hours. The burden hours for computer maintenance are calculated by multiplying the hours of computer use (for a given category) by the number of manufacturers reporting in a category. NHTSA estimates that light vehicle manufacturers will spend approximately 347 hours per year on computer maintenance and that other vehicle manufacturers will spend about 25% as much time as light vehicle manufacturers on computer maintenance. Therefore, NHTSA estimates that medium-heavy truck, trailer, motorcycle manufacturers, emergency vehicle, and bus manufacturers will each spend approximately 86.5 hours on computer maintenance each year. NHTSA estimates that tire manufacturers and child restraint manufacturers will also spend 86.5 hours on computer maintenance per year. Therefore, NHTSA estimates the total burden for computer maintenance to be 35,415 hours per year (based on there being an estimated 36 light vehicle manufacturers, 39 medium-heavy vehicle manufacturers, 96 trailer manufacturers, 15 motorcycle manufacturers, 8 emergency vehicle manufacturers, 33 bus manufacturers, 32 tire manufacturers, and 42 child restraint manufactures).

To calculate the labor cost associated with computer maintenance hours, NHTSA looked at wage estimates for the type of personnel submitting the documents. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Computer Support Specialists (BLS Occupation code 15-1230) in the Motor Vehicle Manufacturing Industry is \$31.39.¹⁶ The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.2% of

¹⁶ https://www.bls.gov/oes/current/naics4_336100.htm#15-0000.

total labor compensation costs.¹⁷ Therefore, NHTSA estimates the hourly labor costs to be \$44.72 for Computer Support Specialists. For the estimated total of 35,415 annual computer maintenance burden hours, NHTSA estimates the associated labor costs will be approximately \$1,583,736. Table 9 shows the annual estimated burden hours for computer maintenance by vehicle/equipment category and the estimated labor costs associated with those burden hours.

Table 9: Estimated Manufacturer Annual Burden Hours for Computer Maintenance for Reporting

Vehicle/Equipment Category	Avg. Number of Manufacturers	Hours for Computer Maintenance per Manufacturer	Average Hourly Labor Cost	Annual Burden Hours for Computer Maintenance	Total Labor Costs
Light Vehicles	36	347	\$44.72	12,492	\$558,642.24
Medium-Heavy Vehicles	39	86.5	\$44.72	3,373.5	\$150,862.92
Trailers	96	86.5	\$44.72	8,304	\$371,352.88
Motorcycles	15	86.5	\$44.72	1,297.5	\$58,024.20
Emergency Vehicles	8	86.5	\$44.72	692	\$30,946.24
Buses	33	86.5	\$44.72	2,854.5	\$127,653.24
Tires	32	86.5	\$44.72	2,768	\$123,784.96
Child Restraints	42	86.5	\$44.72	3,633	\$162,467.76
Totals				35,414.5 35,415 hours	\$1,583,736.44 \$1,583,736

Based on the foregoing, we estimate the burden hours for industry to comply with the current Part 579 reporting requirements (EWR requirements, foreign campaign requirements and Part 579.5 requirements) to be 53,810 hours per year. The total annual burden hours for this information collection consisting of manufacturer communications under Section 579.5 (Subpart A), foreign reporting (Subpart B), EWR submissions and reporting (Subpart C), and computer maintenance is outlined in Table 9 below.

Table 9: Total Manufacturer Burden Hours for this Collection

¹⁷ Employer Costs for Employee Compensation, U.S. Bureau of Labor Statistics, <https://www.bls.gov/news.release/ecec.t01.htm>. Last Accessed July 31, 2020.

Reporting Type	Annual Burden Hours
Subpart A: Manufacturer Communications § 579.5 (Table 1)	2,074
Subpart B: Foreign Reporting (Table 2)	1,590
Subpart C: EWR Submissions and Quarterly Reporting (Tables 4 & 6)	14,731
Computer Maintenance	35,415
Total	53,810 hours

The burden estimates represent an overall increase in burden hours of 4,567 hours. The increase in burden hours is due to increases in the number of submissions and modifying this request to include reporting for common green tires and additional information requested by NHTSA per Section 579.28(l) that were left out of the previous information collection request. The wage estimates have been adjusted to reflect the latest available rates from the Bureau of Labor Statistics.

Estimated Total Annual Burden Cost: NHTSA estimates the collection requires no additional costs to the respondents beyond the labor costs associated with the burden hours to collect and submit the reports to NHTSA and the labor hours and associated labor costs for computer maintenance.

PUBLIC COMMENTS INVITED: You are asked to comment on any aspects of this information collection, including (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; (c) ways to enhance the quality, utility and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

AUTHORITY: The Paperwork Reduction Act of 1995; 44 U.S.C. Chapter 35, as amended; 49

CFR 1.49; and DOT Order 1351.29.

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Office of Defects Investigation.

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